

Thomas K. Coan, OSB #89173
tom@tomcoan.com
Attorney at Law
1001 SW Fifth Ave., Suite 1400
Portland, OR 97204
(503) 221-8736

Attorney for David VanBeenen

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON

UNITED STATES OF AMERICA,)	
Plaintiff,)	Case No. CR 10-229-BR
vs.)	MOTION TO FILE MOTION UNDER
JOSH HALL, and)	SEAL
DAVID VAN BEENEN,)	
Defendant.)	

Defendant David VanBeenen, through his attorney, Thomas K. Coan, move the court for an order allowing him to file the enclosed motion *ex-parte* and under seal because it contains confidential work product that should not be shared with the government.

DATED this 22nd day of March 2011.

Thomas K. Coan
Thomas K. Coan, OSB 89173
Attorney for Defendant Van Beenen